

## U.S. Department of Justice

United States Attorney Southern District o

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DOC #:

DATE FILED:

New York, New York 10007

June 12, 2008

## **BY FACSIMILE**

The Honorable William H. Pauley, III United States District Judge United States Courthouse 500 Pearl Street, Room 2210 New York, New York 10007 Fax: (212) 805-6390

Re:

United States v. Jorge Ramirez

07 Cr. 976 (WHP)

Dear Judge Pauley:

MENO ENDORSED

In connection with the above-referenced matter, the parties, with the assistance of Your Honor's deputy, have been trying to select a date for the hearing on defendant Jorge Ramirez's pending motion to suppress. Because of scheduling conflicts involving the witnesses the Government expects to call at the hearing, the hearing has been adjourned on previous occasions. I have spoken with Louis Aidala, counsel for Mr. Ramirez, and based on the schedules of the parties and witnesses, we write to make a joint request that the suppression hearing be scheduled for any one of the following dates, at a time that is convenient for the Court: July 30, August 11, August 12, August 13, August 14, or August 21, 2008. In addition, the Government and the defense jointly request that time be excluded until the scheduled hearing date under the Speedy Trial Clock, in order to permit the parties to prepare for the hearing, and to discuss a possible disposition of the case.

Respectfully submitted,

APPLICATION GRAFTED THE GOAL HEARING TO AUGUST 13, 2008 ls Adjournen

cc:

SO ORDERED: AT 10:00 Am. SPEEDY

TRIAL TIME IT BY:

EXCLUDED

WILLIAM H. PAULEY III U.S.D.J. AROM MAY 22,

2008 UNTIL AVGUST 13,2008 IN

THE INTERESTS OF JUSTICE Louis R. Aidala, Esq. (by facsimile)

6-16-08

MICHAEL J. GARCIA United States Attorney Southern District of New York

Assistant United States Attorney

(212) 637-2212